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*Attorneys for Plaintiff/Counter-defendant  
and Counter-defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MFR HOLDCO, LLC, a foreign limited  
liability company,

Plaintiff,

v.

ICON RENO PROPERTY OWNER POOL 3  
NEVADA, LLC, a foreign limited liability  
company,

Defendant.

ICON RENO PROPERTY OWNER POOL 3  
NEVADA, LLC, a foreign limited liability  
Company,

Counter-claimant.

v.

MFR HOLDCO, LLC; ACH FOAM  
TECHNOLOGIES, INC.; FRANK  
KIESECKER, JR., individually; RICHARD L.  
WALLER, individually; MICHAEL S.  
HUEMPFNER, individually,

Counter-defendants.

Case No. 3:18-cv-00034-MMD-WGC

**STIPULATION AND ORDER TO  
DISMISS WITH PREJUDICE**

Plaintiff/Counter-Defendant, MFR Holdco, LLC, Counter-Defendant ACH Foam Technologies, Inc., Counter-Defendant, Michael S. Huempfner, Counter-Defendant, Richard L. Waller, and Counter-Defendant, Frank Kiesecker, by and through their undersigned counsel of record, and Defendant/Counter-Claimant, ICON Reno Property Owner Pool 3 Nevada, LLC, by

1 and through its undersigned counsel of record, hereby stipulate and agree that Plaintiff's First  
2 Amended Complaint, Counter-Claimant's Counterclaim, and any and all claims or  
3 counterclaims whatsoever shall be dismissed in their entirety with prejudice (subject to the  
4 terms of the Settlement Agreement and Mutual Releases executed by the parties), and with each  
5 of the above parties bearing their own attorneys' fees and costs that are related to or arising  
6 from this action.

7 DATED this 16th day of July 2019.

8 /s/ Matthew B. Hippler  
9 Matthew B. Hippler (SBN 7015)  
10 Frank Z. LaForge (SBN 12246)  
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16 *Attorneys for Plaintiff/Counter-Defendant, MFR  
17 Holdco, LLC, Counter-Defendant ACH Foam  
18 Technologies, Inc., Counter-Defendant, Michael S.  
19 Huempfer, Counter-Defendant, Richard L. Waller,  
20 Counter-Defendant, Frank Kiesecker*

21 DATED this 16th day of July 2019.

22 /s/ Kirk C. Johnson  
23 Kirk C. Johnson (SBN 4299)  
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*Attorneys for Defendant/Counter-Claimant, ICON  
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**ORDER**

**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE

DATED: July 16, 2019